

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA,**

**v.**

**DAVID LAM,**

**Defendant.**

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**Case No. 4:25-mj-53**

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**UNOPPOSED MOTION FOR PROTECTIVE ORDER REGARDING DISCOVERY**

The United States files this Unopposed Motion for Protective Order pursuant to Fed. R. Crim. P. 16(d)(1) in order to facilitate the sharing of discovery materials. In support of the motion, the United States would show the following:

In the course of complying with its discovery obligations in this case, the Government anticipates producing a significant amount of evidence to Counsel for the defendant, including evidence in electronic format. The discovery materials contain, among other things, personal and private information relating to third parties such as social security numbers, birth dates, addresses, bank records and other highly sensitive, non-public information. Additionally, the discovery could include responses from third parties to grand jury subpoenas, which, in some cases, could include a copy of the subpoenas or references to the subpoenas.

Due to the volume and nature of discovery in this case, the Government respectfully requests, pursuant to Fed. R. Crim. P. 16(d)(1), that the Court enter a protective order with the following provisions:

1. In the course of complying with its discovery obligations, the Government may produce to the attorneys for Defendant certain private, confidential information, including medical

records, financial records, tax records, grand jury subpoenas, and other records containing sensitive, non-public information (hereinafter “Discovery Materials”). Among other things, the Discovery Materials could contain Protected Health Information (as defined under HIPAA and related Privacy Rules), social security numbers, bank records, grand jury subpoenas, birth dates, and other sensitive, non-public information.

2. The Government is authorized to produce the Discovery Materials to Counsel for the defendant.
3. Counsel for the defendant shall take all necessary and appropriate steps to protect the Discovery Materials from unnecessary dissemination.
4. Such Discovery Materials shall be utilized solely in connection with the defense of this case and for no other purpose.
5. Such Discovery Materials and their contents, and any notes or other record of such materials or their contents, should not be disclosed either directly or indirectly to any person or entity other than to the defendant, defendant’s counsel, persons employed to assist with the defense in this case, or such other persons as to whom the Court may authorize disclosure.
6. Such Discovery Materials should not be copied or reproduced except as necessary to provide copies of the material for use by an authorized person as described above to prepare or assist in the defense.

Prior to filing this motion, the government conferred with defense counsel, who stated that defendant is unopposed to the protective order proposed by the government. Wherefore, the Government respectfully requests that the Court grant this motion and enter a Protective Order as requested by the Government.

Dated: February 17, 2025

NICHOLAS J. GANJEI  
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